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*Attorneys for Defendants Benjamin F. Daniels,
Mark W. Schuler, Alton O. Parker, B & B
Investment Group, LLC, and BW Holdings,
LLC d/b/a the "FAIR Project"*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING, INC. (d/b/a "DEBT Box"), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a "CORE 1 CRYPTO"), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the "FAIR PROJECT"), a Utah

**AFFIDAVIT OF ATTORNEYS FEES
AND COSTS FOR DEFENDANTS
BENJAMIN F. DANIELS, MARK W.
SCHULER, ALTON O. PARKER, B&B
INVESTMENT GROUP, LLC, AND BW
HOLDINGS LLC**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDING, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

STATE OF UTAH)
 : ss.
COUNTY OF SALT LAKE)

Thomas A. Brady, being first duly sworn, deposes and states as follows:

1. I am a resident of Davis County, State of Utah. I am over the age of eighteen years and have personal knowledge regarding the matters stated herein.

2. The information contained herein is true to the best of my own personal knowledge, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.

3. I am an attorney of record for Defendants Benjamin F. Daniels, Mark W. Schuler, Alton O. Parker, B&B Investment Group, LLC, and BW Holdings, LLC (collectively, the

“FAIR Project Defendants”) in the above-captioned matter. My billing rate is \$650.00 per hour.

4. I have been admitted to practice law in Utah since 2009. Since joining the law firm of Clyde Snow & Sessions in 2020, I have focused my legal practice, in relevant part, on securities enforcement and crypto asset enforcement and compliance. Prior to joining Clyde Snow & Sessions, I previously served as the Director of the Utah Division of Securities, the Deputy Director of the Utah Department of Commerce, and a member of the State Legislation and Fintech Committees of the North American Securities Administrators Association. I am familiar with the hourly rates charged by attorneys in this area who have similar experience and expertise. The rates are comparable.

5. Keith M. Woodwell (**“Mr. Woodwell”**) is counsel of record for the FAIR Project Defendants. His billing rate is \$650.00 per hour.

6. Mr. Woodwell has been admitted to practice law in Utah since 1995. Since joining the law firm of Clyde Snow & Sessions in 2018, he has focused his legal practice on securities enforcement and crypto asset enforcement and compliance. Prior to joining Clyde Snow & Sessions, Mr. Woodwell previously served as the Director of the Utah Division of Securities for ten (10) years. Mr. Woodwell also previously served in various leadership roles for the North American Securities Administrators Association. I am familiar with the hourly rates charged by attorneys in this area who have similar experience and expertise. The rates are comparable.

7. Katherine E. Pepin (**“Ms. Pepin”**) is counsel of record for the FAIR Project Defendants. Her billing rate is \$350.00 per hour.

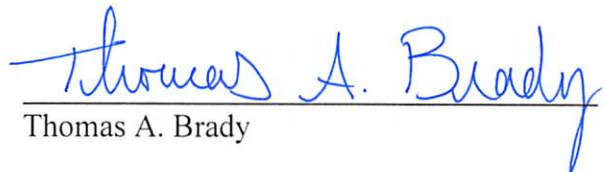
8. Ms. Pepin has been admitted to practice law in Utah since 2018 and, since that time, has practiced in Salt Lake City with an emphasis in securities enforcement and crypto asset enforcement and compliance. I am familiar with the hourly rates charged by attorneys in this area who have similar experience and expertise. The rates are comparable.

9. Blake Buchholz is a paralegal at Clyde Snow & Sessions. Her billing rate is \$225 per hour.

10. The amount of fees and times expended by counsel for the FAIR Project Defendants in the above-captioned matter are reasonable given the complexity of the issues, the experience of counsel, and the amount of work required to be performed by the FAIR Project Defendants' counsel in response to the improperly requested *Ex Parte* Temporary Restraining Order and Expedited Discovery.

11. To date, the FAIR Project Defendants have incurred legal fees in the amount of \$169,070 related to the improperly requested *Ex Parte* Temporary Restraining Order. A reasonable description of the work performed is attached hereto as Exhibit 1.

DATED this 17th day of April 2024.


Thomas A. Brady

Subscribed, sworn to, and acknowledged before me this 17th day of April, 2024, by Thomas A. Brady, the signer of the above instrument, who duly acknowledged to me that he executed the same.


Notary Public



Statement of Account

325672 BW HOLDINGS, LLC
001000 SEC Litigation

Aug-23
Time & Rate: Original Value

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
8/3/2023	KMW	Research on DEBT Box website. Initial meeting with clients to discuss facts and strategy. Internal consult with T. Brady and K. Pepin. Calls with Travis Flaherty and Joe Martinez. Review and analysis of complaint, declaration and exhibits, TRO, asset freeze and receivership documents. Work on engagement letter.	5.50	\$650	\$3,575.00
8/3/2023	TAB	Internal consult with K. Woodwell regarding DEBT Box. Researched website and other materials. Initial meeting with clients to discuss history and strategy. Post debrief and strategy with K. Woodwell and K. Pepin. Reviewed and analyzed complaint and other SEC documents. Call with K. Woodwell.	3.30	\$650	\$2,145.00
8/4/2023	KEP	Meeting with clients; discussion with K. Woodwell and A. Lebenta regarding asset freeze.	1.30	\$350	\$455.00
8/4/2023	KMW	Calls, video conference, and email exchanges with clients. Internal discussions on facts and strategy. Meet with SEC investigator to discuss case. Reach out to counsel for other defendants. Draft and send engagement agreement and conflict waivers.	3.00	\$650	\$1,950.00
8/4/2023	TAB	Met with SEC investigator regarding the case. Consult with K. Woodwell.	0.50	\$650	\$325.00
8/7/2023	KMW	Call with counsel for Brendan Stangis on joint defense and facts of case. Consult with T. Brady on strategy. Email exchanges with clients on assets and business going forward. Call with Ben Daniels on facts and timeline.	1.00	\$650	\$650.00
8/7/2023	TAB	Communication with counsel for DEBT Box. Consult with K. Woodwell. Reviewed receivership information.	0.70	\$650	\$455.00
8/8/2023	KEP	Review and draft Responses to Commission's Expedited Written Discovery Requests.	1.00	\$350	\$350.00
8/8/2023	KMW	Review and analyze all declarations and exhibits filed in SEC case. Email exchanges with clients. Review timeline and assets from Ben Daniels. Email all clients on next steps and SEC discovery requests. Call with counsel for Stangis.	3.50	\$650	\$2,275.00
8/8/2023	TAB	Coordination and status meeting with legal team. (.2) Strategy consult with K. Woodwell. (.2).	0.40	\$650	\$260.00
8/9/2023	KEP	Prepare for and attend meeting with clients; Review documents from client.	1.60	\$350	\$560.00
8/9/2023	KMW	Email exchanges with clients. Video conference with clients to discuss facts and strategy for negotiations with SEC. Review assets and statements provided by clients. Email exchange with SEC. Consult with T. Brady on strategy for working with SEC.	2.50	\$650	\$1,625.00
8/9/2023	TAB	Communication with SEC counsel regarding meeting. Communication with clients. Consult with K. Woodwell.	0.60	\$650	\$390.00
8/10/2023	KMW	Email exchanges with clients. Video conference with SEC to discuss facts, asset freeze, and discovery. Consult with Blake and Tom on production of financial records to the SEC.	1.50	\$650	\$975.00
8/10/2023	TAB	Reviewed notes and case documents in preparation for meeting with SEC. (.7) Prep consult with K. Woodwell. (.2) Call with SEC attorneys. (1) Strategy consult with K. Woodwell and coordination with B. Buchholz on production. (.2)	3.10	\$650	\$2,015.00

		Debrief call with clients. (.5) Researched SEC discovery request. (.5).			
8/11/2023	KMW	Consult with Tom Brady on review of client text messages and strategy for production. Email exchanges. Email exchange with counsel for co-defendants re expedited discovery.	0.50	\$650	\$325.00
8/11/2023	TAB	Met with B. Daniels to review and discuss text threads with Andersons. (.8) Consult with K. Woodwell. (.2); Email communications with B. Daniels and K. Woodwell regarding additional licenses. Coordination with K. Kinsley. (.2).	1.20	\$650	\$780.00
8/14/2023	KMW	Internal consult on strategy for bifurcated settlement. Review and analysis of documents from the SEC. Email exchange with Receiver's counsel.	1.30	\$650	\$845.00
8/14/2023	TAB	Email exchange with receiver. (.2) Status consult with K. Woodwell, A. Labenta, and K. Pepin. (.2) Reviewed transcripts of YouTube video presentations to investors and recorded conversations. (.9).	1.30	\$650	\$845.00
8/15/2023	KEP	Review documents from client.	0.80	\$350	\$280.00
8/15/2023	KMW	Email exchange with Receiver. Consult with B. Buchholz and T. Brady on productions for SEC and Receiver. Video Conference with T. Brady and counsel for Receiver to discuss cooperation and assets related to DLI. Call with Buck Parker.	1.50	\$650	\$975.00
8/15/2023	TAB	Planning meeting with K. Woodwell preparing for call with receiver. (.3) Call with receiver. (.5) Debrief with B. Parker. (.3) Coordination with legal team on production. (.2).	1.30	\$650	\$845.00
8/16/2023	BB	Send sharefile folder link to client; review email from Buck; download and save text message screenshots.	0.30	\$225	\$67.50
8/16/2023	TAB	Communication with client regarding text messages. Reviewed materials. Coordination with B. Buchholz on production.	0.40	\$650	\$260.00
8/17/2023	KMW	Consult with T. Brady and J. Taylor on other defendants. Review asset info and documents from client for production to SEC and Receiver.	0.70	\$650	\$455.00
8/17/2023	TAB	Exchanges with clients.	0.30	\$650	\$195.00
8/21/2023	KEP	Meeting with K. Woodwell and T. Brady to discuss document production and review; Draft correspondence to clients regarding collection of text messages.	0.80	\$350	\$280.00
8/21/2023	BB	Meeting with K. Woodwell and T. Brady to discuss document production and review.	0.20	\$225	\$45.00
8/21/2023	KMW	Internal consult on doc review and production to SEC and Receiver. Video Conference with T. Brady and Dr. Parker. Email exchanges with Receiver. Review financial info on assets and Debt Box licenses for Ben Daniels.	1.40	\$650	\$910.00
8/21/2023	TAB	Video conference with B. Parker and K. Woodwell discussing FAIR and other matters. Consult with K. Woodwell. Email exchanges with receiver regarding interviews.	1.20	\$650	\$780.00
8/22/2023	BB	Emails with clients regarding text message retrieval; meetings with data collection team regarding best process of same.	2.50	\$225	\$562.50
8/22/2023	KMW	Consult with T. Brady and J. Taylor on potential witnesses on Debt Box tech. Review documents from clients and prep production for SEC and Receiver.	1.40	\$650	\$910.00
8/22/2023	TAB	Call with C. Calmes discussing technology platform of DEBT Box. Consult with K. Woodwell.	0.50	\$650	\$325.00
8/23/2023	BB	Review SEC's request for production of documents to Defendants; Review TRO prohibiting the destruction of documents; Meeting with Billy and Ben regarding text message collection; phone calls with Shane regarding ESI collection.	2.00	\$225	\$450.00
8/23/2023	KMW	Conference call with Billy and Ben to discuss production of text messages. Continued review of documents and asset accounting for production to Receiver and SEC. Consult with Kelcie on Receiver interviews with clients. Email exchanges with clients and Receiver's counsel.	1.50	\$650	\$975.00
8/23/2023	TAB	Call with B. Beach and B. Daniels. (.2) Consult with B. Buchholz on production.	0.60	\$650	\$390.00

		(.2) Communication with receiver regarding interviews. Email exchanges with clients. (.2).			
8/24/2023	BB	Email correspondence with TAB and KMW regarding search terms for Billy and Ben's phones in response to document requests #4-5.	0.40	\$225	\$90.00
8/24/2023	KMW	Internal consult on review and production of text threads. Review of documents for production to Receiver.	0.80	\$650	\$520.00
8/24/2023	TAB	Consult with B. Buchholz on text production. (.2) Consult with K. Woodwell. (.2).	0.40	\$650	\$260.00
8/25/2023	KMW	Email exchanges with Receivers counsel. Email exchanges with clients. Internal consult on production. Review docs and prep for Receiver Interviews.	0.90	\$650	\$585.00
8/25/2023	TAB	Email exchanges with receiver regarding interviews. (.2) Reviewed promotional video of D.E.B.T. (1.4) Consult with K. Woodwell. (.2).	1.80	\$650	\$1,170.00
8/28/2023	KMW	Review docs and prepare for interviews with Receiver. Consult with T. Brady. Draft instructions for clients on interviews.	0.80	\$650	\$520.00
8/28/2023	TAB	Email exchange with clients.	0.20	\$650	\$130.00
8/29/2023	KEP	Research and request transcript for hearing on the Commission's Motion for Temporary Restraining Order and to Appoint Receiver.	0.40	\$350	\$140.00
8/29/2023	KMW	Prep for client interviews with Receiver. Meet with Billy and prep for Receiver interview. Receiver interview of Billy Beach; debrief with client and T. Brady. Meet with Ben and prep for Receiver interview. Receiver interview of Ben Daniels; debrief with client and T. Brady. Internal consult on docket and extension for filing Answer. Order hearing transcript from TRO hearing. File Notice of Appearance.	4.60	\$650	\$2,990.00
8/29/2023	TAB	Prepared for receiver interview with B. Beach. Beach interview. Prepared for receiver interview with B. Daniels. Debrief with K. Woodwell and K. Pepin. Coordination with K. Kinsley on entering an appearance. Communication with SEC regarding extension.	4.30	\$650	\$2,795.00
8/30/2023	KEP	Conference with K. Woodwell and T. Brady to discuss strategy for asset freeze and settlement negotiations with the Commission; Review transcript from Ex Parte Hearing on the Commission's Motion for Temporary Restraining Order.	1.40	\$350	\$490.00
8/30/2023	BB	Receipt and file management of Billy and Ben's text messages; email correspondence with Buck regarding collection of his texts; coordinate with Premier legal on text message collection.	3.00	\$225	\$675.00
8/30/2023	KMW	Emails with Buck on text message production and interview with Receiver. Internal consult on production. Review and analyze transcript of court hearing on ex parte TRO motion; consult with K. Pepin. Meet with Buck to discuss strategy and prep for Receiver interview. Attend Receiver interview of Buck. Debrief with client. Internal consult on strategy for asset freeze and preliminary injunction.	4.00	\$650	\$2,600.00
8/30/2023	TAB	Prepared for interview of B. Parker. Receiver interview of B. Parker. Debrief with client. Strategy consult with K. Woodwell and K. Pepin regarding asset freeze and TRO.	3.20	\$650	\$2,080.00
8/31/2023	KEP	Draft Answer to Complaint.	1.30	\$350	\$455.00
8/31/2023	KMW	Email exchanges with clients. Internal consult on production to SEC and Receiver. Review and prepare documents for production to SEC.	1.70	\$650	\$1,105.00
8/31/2023	TAB	Reviewed hearing transcript with Judge Shelby. Email exchanges with B. Parker regarding production and transfers.	1.10	\$650	\$715.00

Total Fees: 08/2023

\$46,110.00

Statement of Account

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
9/1/2023	KEP	Draft Answer to Complaint.	1.10	\$350	\$385.00
9/1/2023	KMW	Email exchanges with Buck on impact of TRO and asset freeze; discuss strategy for relief from the asset freeze. Continue review of documents for production.	0.90	\$650	\$585.00
9/1/2023	TAB	Email exchange with B. Parker regarding tax questions and case status.	0.20	\$650	\$130.00
9/5/2023	KEP	Meeting with T. Brady and K. Woodwell to discuss modification of asset freeze; Conference with T. Brady and K. Woodwell to discuss Notice of Assets.	0.60	\$350	\$210.00
9/5/2023	BB	Meeting with K. Woodwell and T. Brady to discuss text message collection, review and production; document management of Buck's text messages; correspondence with Premier regarding review database.	0.60	\$225	\$135.00
9/5/2023	KMW	Internal consult on strategy for production to SEC and Receiver and negotiations for lifting the asset freeze. Review and analysis of SEC's motion to extend the jurisdiction of the Receiver and declarations from the Receiver and SEC investigator. Prepare accountings for clients to file with SEC. Email clients on Receivership motion and next steps. Email exchange with SEC on asset accounting and relief from asset freeze.	2.80	\$650	\$1,820.00
9/5/2023	TAB	Coordination and planning meeting with legal team. (.2) Consult with K. Woodwell and K. Pepin on financial filings and motion to modify TRO. (.2) Reviewed filings. (.2) Email exchanges with SEC regarding asset freeze. (.2).	0.80	\$650	\$520.00
9/6/2023	KEP	Draft Accounting of Assets, Schedule of Assets, and Stipulated Motion for Leave to File Under Seal the Accounting of Assets; Review and revise Response to Receiver's Document Request.	4.40	\$350	\$1,540.00
9/6/2023	KMW	Consult with K. Pepin on accounting of assets and stipulation with the SEC on sealing the accountings. Review and revise notice of accounting filings. Review accountings and related orders for other defendants.	1.50	\$650	\$975.00
9/6/2023	TAB	Reviewed Martinez proposed stipulation and order. Consult with K. Pepin and K. Woodwell.	0.50	\$650	\$325.00
9/7/2023	KEP	Research and review case termination notice; conference with K. Woodwell and B. Buchholz regarding Schedule of Assets.	0.40	\$350	\$140.00
9/7/2023	BB	Consult with KMW regarding asset spreadsheets.	0.20	\$225	\$45.00
9/7/2023	KMW	Review Receiver's Notice of Action. Review asset information and consult with Katey and Blake. Email exchange with Parker on strategy for relief from asset freeze.	0.70	\$650	\$455.00
9/7/2023	TAB	Coordination with K. Woodwell and B. Buchholz on accounting. (.2) Strategy consult with K. Woodwell regarding terms for the SEC on asset freeze. (.2) Email communications with clients. (.2).	0.60	\$650	\$390.00
9/8/2023	BB	Draft accounting spreadsheets of assets and liabilities of Billy and Ben.	3.50	\$225	\$787.50
9/11/2023	KEP	Draft Benjamin F. Daniels, Mark W. Schuler, and B&B Investment Group, LLC's Answer to Complaint.	3.20	\$350	\$1,120.00
9/11/2023	BB	Prepare database of text messages for attorney review; draft email to KMW and TAB regarding same; Draft accounting spreadsheets of assets and liabilities of Buck; send spreadsheets to KMW for review.	2.50	\$225	\$562.50
9/11/2023	KMW	Review of asset production for SEC. Consult with Blake Buchholz on text message and email review.	0.30	\$650	\$195.00
9/11/2023	TAB	Email exchange with clients regarding case status. (.2) Coordination with B. Buchholz on text message reviews. (.2) Emails exchange with K. Pepin and K. Woodwell regarding Green decision. (.2).	0.60	\$650	\$390.00

9/12/2023	KEP	Research regarding permissibility of TRO where no fraud has been alleged.	4.80	\$350	\$1,680.00
9/12/2023	KMW	Review and analysis of motion to dissolve TRO and accompanying exhibits and declarations filed by Debt Box Defendants. Review and analysis of motion to dismiss filed in Green case. Consult with T. Brady and K. Pepin to discuss strategy for motion to lift asset freeze. Email exchange with clients. Review and analysis of discovery requests from Debt Box defendants to the SEC. Research for motion to challenge TRO.	4.30	\$650	\$2,795.00
9/12/2023	TAB	Researched Motion to Dissolve TRO and Appoint New Receiver by Anderson's counsel. (1) Researched Motion to Dismiss in Green case. (.6) Strategy conference call with K. Woodwell and K. Pepin regarding motion. (.4) Exchanges with Counsel for Green and relief defendants in DLI case. (.2) Communication with clients regarding case updates. (.2) Consult with K. Pepin in research for Section 5 violations. (.3) Call with K. Woodwell discussing upcoming Briefing Schedule Hearing. (.2) Email to SEC warning of pending motion and requesting call. (.2).	3.10	\$650	\$2,015.00
9/13/2023	KEP	Prepare for and attend conference with the Commission regarding the TRO and PI; attend conference with clients regarding the same; Prepare for and attend call with clients to discuss case status; attend call with J. Bletzacker to discuss Motion to Dismiss in Green/Thurston case; Research and review Senator Lummis' Amicus Brief and Motion for Judgment on the Pleadings filed in Coinbase lawsuit.	4.40	\$350	\$1,540.00
9/13/2023	KMW	Video conferences with clients to discuss motion filed by Debt Box and decision in the Green United case. Discuss strategy going forward for relief from asset freeze. Video conference with counsel for Green United on strategy used and applicability to our case. Research on amicus briefs and motion for judgment on the pleadings from Coinbase SEC litigation and oral argument notes from Green United case. Video conference with SEC counsel to negotiate relief from asset freeze and terms of preliminary injunction. Internal consult on strategy and potential motion to dismiss.	4.80	\$650	\$3,120.00
9/13/2023	TAB	Internal consult with K. Woodwell regarding hearing. (.2) Video conference with clients. (.5) Video conference with counsel for Green regarding ruling. (.7) Researched amicus brief filed by Senator Lummis. (.4) Video conference with SEC attorneys regarding stipulated asset freeze agreement. (.5) Debrief with clients. (.4).	2.70	\$650	\$1,755.00
9/14/2023	KMW	Review and analyze Receiver's first report of activities and motion for contempt sanctions against the Debt Box defendants. Review oral argument notes and supporting briefs from Green United motion to dismiss. Consult with T. Brady on strategy for motion to dismiss. Prep outline of arguments for motion to dismiss. Review draft asset disclosures. Review proposed order on sanctions motion. Review Debt Box defendants first set of interrogatories and requests for admission to the SEC.	4.10	\$650	\$2,665.00
9/14/2023	TAB	Internal consult with K. Woodwell regarding failure on the pleadings argument and other matters. (.2) Email exchange with B. Parker regarding counsel for Anderson. (.2) Research receiver's motion for sanctions. (.4) Researched outline and arguments in Green case. () Email exchanges with SEC regarding assets. Reviewed Motion to Clarify filed by Receiver. (.3) Read Motion to Dissolve filed by Martinez and other pleadings. (.4).	2.40	\$650	\$1,560.00
9/15/2023	KEP	Review and draft Responses to Expedited Discovery Requests for each client; review documents received from clients; Prepare for and attend status conference.	7.40	\$350	\$2,590.00
9/15/2023	KMW	Email exchanges with clients on discovery requests. Review discovery	0.40	\$650	\$260.00

requests from Debt Box defendants.					
9/15/2023	TAB	Prepared for and attended Status Hearing with Judge Shelby and all parties counsel. (2.1) Call with K. Woodwell debriefing. (.2) Prepared update and email to clients laying out scheduling plan. (.3).	2.60	\$650	\$1,690.00
9/18/2023	KEP	Review and revise Responses to Expedited Discovery Requests.	2.50	\$350	\$875.00
9/18/2023	BB	Meeting with T. Brady, K. Woodwell, and K. Pepin regarding discovery responses; work on asset spreadsheets and draft email to K. Pepin summarizing status.	1.00	\$225	\$225.00
9/18/2023	KMW	Internal consultations on responses to TRO and discovery requests. Review and revise draft discovery responses and questions for clients. Review and analyze iX Global's motion to modify the asset freeze and TRO. Review and analyze Debt Box's supplemental authority on motion to revoke TRO. Prep for status conference with court. Attend status conference with court and all parties. Begin review of client text messages. Email clients re status conference.	3.70	\$650	\$2,405.00
9/18/2023	TAB	Coordination meeting with legal team. (.2) Reviewed draft Responses to Expedited Discovery Request. (.3) Consult with K. Woodwell and K. Pepin on response. (.2) Attended status conference hearing. (.5).	1.20	\$650	\$780.00
9/19/2023	KEP	Review and revise Responses to Commission's Expedited Discovery Requests; review documents from client and prepare for production.	4.70	\$350	\$1,645.00
9/19/2023	BB	Receipt and document management of files from clients for discovery responses.	0.50	\$225	\$112.50
9/19/2023	KMW	Email exchanges with court and all counsel on need for a status conference. Email exchange with clients. File notice of appearance on behalf of B&B Investment Group. Consult with K. Pepin on asset accountings for clients.	0.60	\$650	\$390.00
9/19/2023	TAB	Email exchanges with coordinating counsel for Tier 2 defendants. (.2) Coordinated and reviewed notice of appearance with S. Afridi. (.2).	0.40	\$650	\$260.00
9/20/2023	KEP	Review and revise Responses to the Commission's Expedited Discovery Requests; review documents from client and prepare for production.	2.20	\$350	\$770.00
9/20/2023	KMW	Consult with K. Pepin on discovery responses. Email exchange with Parker on production to the SEC. Email exchange with court and counsel on need for status conference today.	0.60	\$650	\$390.00
9/20/2023	TAB	Reviewed TRO modification for Fritzsche. (.2) Consult with K. Pepin on production requirements. (.2) Communication with coordinator and others regarding hearing. Reviewed email exchanges between counsel. (.2).	0.60	\$650	\$390.00
9/21/2023	KEP	Review and revise Responses to Commission's Expedited Discovery Requests.	2.70	\$350	\$945.00
9/21/2023	BB	Prepare documents to produce in response to discovery requests; send file to Shane to load into review database; email correspondence with K. Woodwell and K. Pepin.	1.50	\$225	\$337.50
9/21/2023	KMW	Internal consult on response to expedited discovery requests. Review and analysis of Fritzsche's motion to dissolve TRO. Review and revise responses to discovery requests for Beach and Daniels. Email exchanges with court and counsel. Review of client text messages.	1.80	\$650	\$1,170.00
9/21/2023	TAB	Call with B. Beach. (.2) Consult with K. Woodwell. (.2) Coordination with B. Buchholz and K. Pepin on production. (.2) Reviewed text messages and other documents for production. (1.4) Communications with coordinator for counsel, Receiver, SEC, and court. (.2).	2.00	\$650	\$1,300.00
9/22/2023	KEP	Review documents and communications from client to prepare for production to the Commission.	0.30	\$350	\$105.00
9/22/2023	KMW	Email exchanges with Tom Brady and clients.	0.20	\$650	\$130.00
9/22/2023	TAB	Reviewed status report of the Receiver filed with the court on the rigs. (.2)	5.10	\$650	\$3,315.00

		Reviewed text messages and for production. (4) Email exchanges with B. Parker. Prepared status update for clients. (.3) Consults with K. Pepin. (.3) Prepared list for B. Buchholz. (.3).			
9/25/2023	KEP	Prepare for and attend conference with counsel for non-fraudulent defendants to discuss Motion to Dissolve TRO and strategy; Review documents from client to prepare for production; review pleadings filed with court.	1.90	\$350	\$665.00
9/25/2023	BB	Review and draft index of production; draft email to K. Pepin regarding bates ranges of documents that are ready to be produced; Review email from T. Brady regarding text messages for production; consult with T. Brady regarding production format.	1.40	\$225	\$315.00
9/25/2023	KMW	Review and analysis of Debt Box Defendants' opposition to motion to clarify receivership. Consult with T. Brady on strategy for production of client text messages. Review new motion from Debt Box defendants. Internal consult on production of text messages. Review accounting production. Video conference with non-fraud defendants to discuss strategy.	2.60	\$650	\$1,690.00
9/25/2023	TAB	Strategy consult with K. Woodwell regarding text production. (.2) Communications from coordinating counsel in litigation. (.2) Coordinated with B. Buchholz on text production and reviewed texts for production. (1.2) Strategy consult with K. Woodwell and K. Pepin regarding Anderson Motion. (.3) Conference call with counsel for other defendants discussing strategy. (.5).	2.40	\$650	\$1,560.00
9/26/2023	KEP	Research for new case law interpreting crypto currencies as commodities and not securities; Finalize and submit Responses to Expedited Discovery Requests for Ben Daniels, Billy Beach, and B&B Investment Group.	1.70	\$350	\$595.00
9/26/2023	KMW	Internal consult on SEC production. Review and finalize discovery responses.	0.70	\$650	\$455.00
9/26/2023	TAB	Coordination with S. Afridi on scheduling. (.2) Reviewed latest TRO order from J. Shelby. (.2) Communication with SEC regarding discovery requests. (.2) Call with counsel for one of the investors regarding claims from S. Reyes. (.4).	1.00	\$650	\$650.00
9/27/2023	BB	Finalize Defendant's (Beach, Daniels, and B&B Investment) Responses to the Commission's Expedited Discovery Requests and produce pleadings and document productions to the SEC via email; Work on text message production.	1.60	\$225	\$360.00
9/27/2023	TAB	Email exchanges with coordinating counsel and others regarding latest TRO ruling. (.2) Call with B. Parker. (.4) Call with K. Woodwell discussing strategy. (.2) Communications with counsel for Andersons. (.2).	1.00	\$650	\$650.00
9/28/2023	KEP	Review and revise responses to expedited discovery requests.	1.10	\$350	\$385.00
9/28/2023	KMW	Review and analysis of Green United's supplemental briefing on technology and securities analysis. Review and analysis of SEC's and Receiver's oppositions to motions to dissolve TRO. Review and analysis of Debt Box Defendants opposition to motion for contempt and sanctions. Consult with T. Brady on discussions with counsel for Debt Box defendants and briefing in the Green United case.	1.80	\$650	\$1,170.00
9/28/2023	TAB	Reviewed SEC response to Motion to Modify TRO. (.3) Researched Green United Supplemental Brief. (.3) Call with counsel for DLI regarding strategy. (.9) Reviewed Response by SEC to DLI Motion. (.5) Reviewed Opposition to Motion for Contempt and Sanctions. (.3).	2.30	\$650	\$1,495.00
9/29/2023	BB	Phone call to T. Brady regarding text message production; email correspondence with Shane regarding batch of text message production; review and tag documents for production.	1.20	\$225	\$270.00
9/29/2023	KMW	Email exchange with client; email exchange with SEC. Review of stipulated changes to TRO.	0.30	\$650	\$195.00
9/29/2023	TAB	Coordination with B. Buchholz on text production. (.2) Communications with clients regarding financial production status. (.2).	0.40	\$650	\$260.00

Total Fees: 09/2023**\$58,640.00**

Statement of Account

325672 BW HOLDINGS, LLC
001000 SEC Litigation

Oct-23
Time & Rate: Original Value

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
10/2/2023	KEP	Review and revise Accounting of Assets for Ben Daniels and Billy Beach.	1.70	\$350	\$595.00
10/2/2023	BB	Meeting with T. Brady, K. Woodwell and K. Pepin regarding status of case; Finalize text message production for Billy and Ben; produce text messages to SEC.	0.70	\$225	\$157.50
10/2/2023	TAB	Coordination meeting with legal team discussing production and assignments. (.2) Email exchanges with B. Parker regarding FAIR financials. (.2) Finalized review of B. Daniels group text threads. (.9) Coordination with B. Buchholz on production. (.2) Email exchange with B. Daniels with clarifying questions. (.2).	1.70	\$650	\$1,105.00
10/3/2023	KEP	Review and revise Accounting of Assets for Ben Daniels.	1.40	\$350	\$490.00
10/3/2023	KMW	Review and revise asset accountings for Beach and Daniels. Internal consult on SEC production.	0.50	\$650	\$325.00
10/3/2023	TAB	Call with B. Daniels regarding case update, strategy, and clarifying questions related to production. (.6) Call with B. Beach regarding case update and answering questions. (.4) Internal consults with K. Woodwell and K. Pepin regarding strategy and monthly expenditure production. (.3) Text review for production. (1.6) Prepared email to coordinating counsel regarding draft of Motion. (.2).	3.10	\$650	\$2,015.00
10/4/2023	BB	Phone call with T. Brady regarding text message production.	0.50	\$225	\$112.50
10/4/2023	TAB	Communications with K. Woodwell and K. Pepin regarding request from receiver. (.2) Call with B. Buchholz regarding redactions and other production matters. (.4) Reviewed email exchanges with coordinating counsel and others. (.2).	0.80	\$650	\$520.00
10/5/2023	KEP	Review briefing on IX Global's Motion to Dismiss.	0.80	\$350	\$280.00
10/5/2023	KMW	Review and analysis of FAIR balance sheet and P&L statement; email exchange with Parker and T. Brady. Internal consult on sharing FAIR accounting with SEC. Review Debt Box defendants motion for extension of deadline to file answer. Review IX Global's and Debt Box Defendants' reply memo on motion to vacate TRO; review and sign joint defense agreement. Consult with T. Brady on text messages. Finalize asset accountings for Beach and Daniels. Email exchanges with clients.	3.80	\$650	\$2,470.00
10/5/2023	TAB	Reviewed Schedule of Assets & Liabilities. (.2) Text review for production. (2.7) Consult with K. Woodwell regarding manual distribution. (.2) Coordination with K. Kinsley and K. Woodwell on JDA. (.2) Reviewed communications from opposing counsel. (.2) Communications with SEC and receipt of initial production. (.2).	3.70	\$650	\$2,405.00
10/6/2023	KEP	Prepare for and attend hearing on Motion for Temporary Restraining Order; conference with clients to discuss the Court's ruling; Revise and finalize Accounting of Assets for Ben Daniels and Billy Beach.	3.20	\$350	\$1,120.00
10/6/2023	KMW	Email exchanges with clients. Send asset accountings to SEC. Prep for hearing on TRO motions. Review Receiver's memo on motions. Attend hearing with Judge Shelby on TRO motions. Debrief with clients on impact of hearing. Internal consult on strategy.	3.80	\$650	\$2,470.00

10/6/2023	TAB	Reviewed text threads. (.7) Communications with clients. (.2)	3.00	\$650	\$1,950.00
		Attended hearing. (1.4) Post debrief with clients and consult on next steps. (.5)			
		Call with counsel for other defendants. (.2).			
10/9/2023	KMW	Email exchanges with clients on court order and operations. Consult with T. Brady.	0.70	\$650	\$455.00
10/9/2023	TAB	Communications with client regarding Order status and other questions(.2).	0.20	\$650	\$130.00
10/10/2023	KMW	Email exchanges with defense counsel on meet and confer ordered by court.	1.40	\$650	\$910.00
		Video conference meet and confer with all defense counsel to discuss			
		Receivership transition and other issues. Review docket on consent to TRO			
		and email DLI counsel. Review transcript from 10/6/2023 court hearing.			
10/10/2023	TAB	Email exchanges with counsel for other defendants. (.2); Call with K. Woodwell	0.80	\$650	\$520.00
		prepping for Confer Call. (.2) Meet and confer with counsel for other			
		defendants regarding dissolution of TRO. (.4).			
10/11/2023	KMW	Internal consult with T. Brady. Meet with clients to discuss strategy and next	1.70	\$650	\$1,105.00
		steps in case. Email exchange with all defense counsel and review of proposed			
		Receiver transition plan.			
10/11/2023	TAB	Meeting with clients and K. Woodwell to discuss next phase of the litigation.	0.70	\$650	\$455.00
		(.5) Reviewed draft Proposed Receiver Transition Plan. (.2).			
10/12/2023	KMW	Email exchanges with defense counsel; review and revise report on dissolution	0.80	\$650	\$520.00
		of receivership. Consult with K. Pepin and T. Brady.			
10/12/2023	TAB	Call with B. Beach regarding threat. (.2) Email exchange with B. Daniels	0.40	\$650	\$260.00
		regarding Instagram suspension. (.2).			
10/16/2023	KEP	Review pleading filed by the Commission.	0.30	\$350	\$105.00
10/16/2023	BB	Meeting with T. Brady and K. Woodwell to discuss strategy post hearing.	0.20	\$225	\$45.00
10/16/2023	KMW	Internal consult on new filings and strategy with SEC going forward. Review	1.60	\$650	\$1,040.00
		and analysis of Receiver's Status Report on Transition and Wind Down.			
		Consult with T. Brady. Email exchange with counsel for Ryan Bowen.			
10/16/2023	TAB	Internal consult with K. Woodwell.	0.30	\$650	\$195.00
10/17/2023	KMW	Review court order vacating hearing on preliminary injunction; internal consult.	0.30	\$650	\$195.00
		Email exchange with clients.			
10/17/2023	TAB	Communication with clients.	0.20	\$650	\$130.00
10/18/2023	KEP	Review briefing filed by DLI Defendants regarding receivership.	0.30	\$350	\$105.00
10/18/2023	KMW	Email exchanges with clients. Review status report on Receivership transition	0.30	\$650	\$195.00
		filed by DLI defendants.			
10/19/2023	KMW	Email exchange with clients.	0.20	\$650	\$130.00
10/20/2023	KMW	Review and analysis of documents produced by SEC. Call with counsel for	1.30	\$650	\$845.00
		non-fraud defendants.			
10/23/2023	KMW	Internal consults with A. Lebenta and T. Brady.	0.20	\$650	\$130.00
10/23/2023	TAB	Reviewed status filing submitted by DLI counsel.	0.20	\$650	\$130.00
10/30/2023	KEP	Conference with K. Woodwell and T. Brady to discuss discovery status.	0.20	\$350	\$70.00
10/30/2023	BB	Conference with K. Woodwell and T. Brady to discuss discovery status.	0.20	\$225	\$45.00
10/31/2023	KMW	Internal consult on SEC sanctions and impact on complaint. Email exchanges	1.00	\$650	\$650.00
		with clients on status of case.			

Total Fees: 10/2023

\$24,380.00

Statement of Account

325672 BW HOLDINGS, LLC
001000 SEC Litigation

Nov-23
Time & Rate: Original Value

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
11/2/2023	KMW	Meet with Dr. Parker and family to discuss facts and allegations of case and potential outcomes. Internal consult with T. Brady.	2.50	\$650	\$1,625.00
11/2/2023	TAB	Prep meeting with K. Woodwell. (.2) Meeting with B. Parker and family to discuss case history, status, strategy, and other matters. (1.3) Researched SEC response to Memorandum in Opposition in Green case. (.4).	1.70	\$650	\$1,105.00
11/3/2023	KEP	Review pleadings filed by the Receiver and DLI.	0.50	\$350	\$175.00
11/3/2023	KMW	Review and analysis of Receiver's 11-2-2023 status report. Research on Green United briefing from SEC and related cases.	0.60	\$650	\$390.00
11/6/2023	KMW	Review and analysis of DLI's second status report on Receivership transition. Email clients on status.	0.40	\$650	\$260.00
11/7/2023	KMW	Email exchange with counsel for Green United on passing of Judge Jenkins and impact on case. Email exchange with clients.	0.20	\$650	\$130.00
11/7/2023	TAB	Communication with counsel for coordinating counsel defendants. (.2) Email exchanges with client regarding Green status. (.2).	0.40	\$650	\$260.00
11/8/2023	TAB	Text exchanges and call with B. Daniels regarding case status. (.3) Call with counsel for Green regarding case status and new judge. (.5) Reviewed pleadings from SEC. (.2).	1.00	\$650	\$650.00
11/13/2023	KEP	Conference with K. Woodwell and T. Brady to discuss case status.	0.20	\$350	\$70.00
11/14/2023	KMW	Consult with T. Brady. Email and call with Law360 reporter. Email update to clients.	1.00	\$650	\$650.00
11/14/2023	TAB	Reviewed media request and consult with K. Woodwell regarding the same and other matters. (.2) Communication with clients regarding updates. Reviewed pleadings. (.2) Review SEC's motion for alternative service and related exhibits.	0.40	\$650	\$260.00
11/15/2023	TAB	Reviewed SEC motion for alternative service and exhibits.	0.30	\$650	\$195.00
11/16/2023	TAB	Meeting with coordinating counsel discussing case status, procedural matters, and strategy.	0.20	\$650	\$130.00
11/20/2023	TAB	Coordination with counsel for other non-fraud defendants on extension to Answer and order status. Review court order on alternative service.	0.20	\$650	\$130.00
11/22/2023	KMW	Review DLI motion for extension to reply to motion to dismiss.	0.30	\$650	\$195.00
11/22/2023	TAB	Reviewed communication from counsel for non-fraud defendants and magistrate order on alternative service to Franklin.	0.20	\$650	\$130.00
11/27/2023	BB	Status meeting with KMW and TAB.	0.20	\$225	\$45.00
11/29/2023	KMW	Review court notice on 1-17-2024 status conference.	0.40	\$650	\$260.00
11/30/2023	KMW	Review and analysis of court's memorandum decision and order dissolving the TRO. Email clients. Internal consult. Review and analysis of court's order to show cause for sanctions against SEC; email clients. Outline arguments for reply memo in support of motion to dismiss.	1.20	\$650	\$780.00
11/30/2023	TAB	Reviewed Order to Show Cause filed by Judge Shelby. (.4) Consults with K. Woodwell and K. Pepin. (.2).	0.60	\$650	\$390.00

Total Fees: 11/2023

\$7,830.00

Statement of Account

325672 BW HOLDINGS, LLC
001000 SEC Litigation

Dec-23

Time & Rate: Original Value

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
12/4/2023	KMW	Research on Terraforma Labs case citation to Shelby's ruling in this case; review press coverage of Shelby's orders. Email exchange with	2.20	\$650	\$1,430.00

12/4/2023	TAB	Strategy consult with K. Woodwell and K. Pepin. (.2)	0.20	\$650	\$130.00
12/5/2023	KMW	Respond to press inquiries on case and review press coverage of case. Email update to clients. Consult with T. Brady and K. Pepin.	1.00	\$650	\$650.00
12/5/2023	TAB	Reviewed Reply Memo from DLI defendants citing additional misrepresentations by the SEC. (.8) Consults with K. Woodwell and K. Pepin regarding strategy and fall out. (.4) Communication with clients. (.2).	1.40	\$650	\$910.00
12/6/2023	KEP	Review correspondence with counsel regarding extension and new counsel for the SEC.	0.50	\$350	\$175.00
12/6/2023	KMW	Email exchange with SEC Office of General Counsel on substitution of counsel for SEC and extension of deadlines. Email exchanges with other defense counsel. Internal consult on impact of removal of SEC counsel. Email exchange with clients on impact of change in SEC counsel.	0.60	\$650	\$390.00
12/6/2023	TAB	Reviewed communications and filings from the Office of General Counsel for the SEC regarding appearance. (.3) Call with K. Woodwell discussing fall out and strategy. (.3) Communications with B. Daniels regarding Chase Bank issue and TRO dissolution. (.2) Consult with former SEC Director on potential outcomes. (.2).	1.00	\$650	\$650.00
12/7/2023	KMW	Review notices of appearance from SEC Office of General Counsel attorneys. Review SEC motion in regards to OSC; review proposed order; email exchange with SEC. Consult with T. Brady on impact of OGC investigation and strategy for case.	1.00	\$650	\$650.00
12/8/2023	KMW	Email exchange with reporters covering OGC actions in case. Internal consult.	0.20	\$650	\$130.00
12/11/2023	KEP	Conference with K. Woodwell and T. Brady to discuss pending motions.	0.20	\$350	\$70.00
12/11/2023	BB	Attend status meeting.	0.20	\$225	\$45.00
12/11/2023	TAB	Call with B. Parker and K. Woodwell discussing business options. (.4) Consult with K. Woodwell. (.2).	0.60	\$650	\$390.00
12/15/2023	KMW	Consult with T. Brady on strategy working with other defendants.	0.20	\$650	\$130.00
12/21/2023	TAB	Communications with new counsel for SEC. Reviewed pleadings. (.3).	0.30	\$650	\$195.00
12/22/2023	KMW	Email exchange with counsel for non-fraud defendants.	0.30	\$650	\$195.00
12/29/2023	KMW	Emails, texts, and conference with clients to discuss impact of TRO and asset freeze. Consult with T. Brady.	1.60	\$650	\$1,040.00
12/29/2023	TAB	Conference call with clients, K. Woodwell, and K. Pepin discussing strategy and plan to document damages. (.4).	0.40	\$650	\$260.00
Total Fees: 12/2023					\$7,440.00

Statement of Account

325672 BW HOLDINGS, LLC
001000 SEC Litigation

Jan-24
Time & Rate: Original Value

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
1/2/2024	KMW	Email exchange with Buck on listing of RXT token. Email exchange with non-fraud counsel regarding strategy for memo and inclusion of declarations from clients.	0.40	\$650	\$260.00
1/2/2024	TAB	Consult with K. Woodwell and K. Pepin regarding Reply deadline. (.2) Communications with B. Parker regarding RXT token offering. (.2) Reviewed correspondence from coordinating counsel. (.2).	0.60	\$650	\$390.00
1/3/2024	KMW	Email exchange with non-fraud defendants on strategy for response to SEC sanctions. Conference with Dr. Parker and T. Brady to discuss strategy for continued operation of the FAIR Project. Consult with T. Brady. Research for	1.60	\$650	\$1,040.00

SEC sanctions memo.

1/3/2024	TAB	Call with B. Parker and K. Woodwell regarding token listing or secondary offering options. (1).	1.00	\$650	\$650.00
1/4/2024	KEP	Review and revise Reply to SEC Response to Order to Show Cause and supporting declarations.	2.10	\$350	\$735.00
1/4/2024	KMW	Email exchanges with clients. Review draft testimony of Dr. Parker. Consult with T. Brady. Email exchange with counsel for non-fraud defendants on memo and declarations in support of sanctions against the SEC.	0.60	\$650	\$390.00
1/4/2024	TAB	Communications with B. Parker regarding solicitations. (.2) Consult with K. Woodwell. (.2) Reviewed and edited draft response to OSC along with Exhibits. (1.1).	1.50	\$650	\$975.00
1/5/2024	KMW	Email exchange with Dr. Parker on testimonial. Review draft memo and declaration from iX Global counsel.	0.40	\$650	\$260.00
1/5/2024	TAB	Reviewed material for declaration by B. Parker. Communication with client.	0.30	\$650	\$195.00
1/8/2024	KEP	Conference with T. Brady and K. Woodwell to discuss declarations and Reply to Commission's Response to Order to Show Cause.	0.20	\$350	\$70.00
1/8/2024	KMW	Consult with T. Brady; email clients.	0.20	\$650	\$130.00
1/8/2024	TAB	Status meeting with K. Woodwell and K. Pepin. (.2) Communications with clients regarding damage statements and other matters. (.2).	0.40	\$650	\$260.00
1/9/2024	KMW	Email exchanges with clients. Review or damages claims from clients; work on declarations. Consult with T. Brady. Review and revisions to non-fraud defendants response to the SEC memo on sanctions. Email exchanges with counsel for non-fraud defendants. Consult with T. Brady.	2.50	\$650	\$1,625.00
1/9/2024	TAB	Call with B. Daniels regarding Declaration of damages and soliciting. (.2) Call with K. Woodwell discussing Reply Memo and Declarations. (.2) Communications with coordinating counsel regarding strategy and Reply Memo. (.3) Reviewed revised declaration from B. Parker. (.2).	0.90	\$650	\$585.00
1/10/2024	KMW	Review details on damages from clients and work on declarations. Consult with T. Brady on strategy for sanctions and client activity on new deals going forward. Email exchanges with non-fraud defendants. Draft language for sanctions memo; consult with K. Pepin on joinders and declarations.	0.90	\$650	\$585.00
1/10/2024	TAB	Consult with K. Woodwell on Reply Memo. (.2).	0.20	\$650	\$130.00
1/11/2024	KEP	Review testimony from client and draft declarations to support harm caused by TRO.	0.80	\$350	\$280.00
1/11/2024	TAB	Attention to emails between SEC counsel and DLI defendants counsel regarding exchange of joint status reports.	0.20	\$650	\$130.00
1/12/2024	KMW	Email exchange with SEC and defense counsel on joint status report due to court on Jan. 17th. Review damages evidence from Dr. Parker; email exchange with Dr. Parker on strategy for sanctions. Review joinder in sanctions memo. Email exchange with other defense counsel on final drafts of sanctions memos. Review filed memos from DLI defendants and iX Global defendants.	1.60	\$650	\$1,040.00
1/12/2024	TAB	Reviewed final draft of joinder. (.2) Communications with coordinating counsel on strategy and timing. (.2).	0.40	\$650	\$260.00
1/15/2024	KMW	Email exchange with Buck Parker on damages for sanctions motion.	0.20	\$650	\$130.00
1/17/2024	KMW	Emails and review of status reports from all parties.	0.90	\$650	\$585.00
1/17/2024	TAB	Communications with SEC counsel.(.2) Reviewed proposed JSR from the SEC and provided assessment to coordinating counsel. (.4) Reviewed proposed JSR draft from coordinating counsel and DLI counsel and provided assessment. (.4) Attention to multiple procedural and pleading email exchanges from coordinating counsel and SEC counsel. (.3) Reviewed final draft including changes from Receiver. (.2).	1.50	\$650	\$975.00
1/22/2024	KMW	Email exchanges with clients on damages.	0.20	\$650	\$130.00

1/22/2024	TAB	Communication with client regarding case status and additional damages.	0.20	\$650	\$130.00
1/23/2024	KEP	Conference with K. Woodwell and T. Brady to discuss damages evidence declarations.	0.20	\$350	\$70.00
1/24/2024	TAB	Text exchanges with B. Beach regarding FOIA request. Reviewed request.	0.30	\$650	\$195.00
1/26/2024	KMW	Court order on status conference. Internal consult.	0.20	\$650	\$130.00
1/26/2024	TAB	Call with K. Woodwell discussing latest Notice Vacating hearing and other matters. (.2).	0.20	\$650	\$130.00

Total Fees: 01/2024

\$12,465.00

Statement of Account

325672 BW HOLDINGS, LLC
001000 SEC Litigation

02/01/2024

Time & Rate: Original Value

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
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Total Fees: 02/2024

\$0.00

Statement of Account

325672 BW HOLDINGS, LLC
001000 SEC Litigation

03/01/2024

Time & Rate: Original Value

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
3/18/2024	KEP	Review Memorandum Decision and Order on Motion for Sanctions; draft correspondence and meet with clients regarding the same.	2.00	\$350	\$700.00
3/18/2024	KMW	Review and analysis of court order imposing sanction against the SEC; consult with T. Brady and K. Pepin. Video conference with clients to discuss court order. Research on allowable fees and costs.	2.00	\$650	\$1,300.00
3/18/2024	TAB	Analysis of court order imposing sanctions. Consults with K. Woodwell and K. Pepin. Video conference with clients debriefing order.	1.70	\$650	\$1,105.00
3/19/2024	TAB	Communications from counsel for coordinating defendants. (.2).	0.20	\$650	\$130.00
3/20/2024	KEP	Review and draft correspondence regarding Affidavit of Attorneys Fees and Costs for sanctions order.	0.30	\$350	\$105.00
3/20/2024	KMW	Research for allowable fees and costs; work on fee affidavit.	0.80	\$650	\$520.00
3/21/2024	KMW	Email exchange with SEC counsel; review letter on discovery misrepresentations. Internal consult on discovery.	0.30	\$650	\$195.00
3/21/2024	TAB	Communications from SEC counsel regarding discovery responses.	0.20	\$650	\$130.00
3/22/2024	TAB	Meeting with SEC. (1.2) Consult with K. Woodwell. (.2).	1.40	\$650	\$910.00
3/26/2024	KEP	Review Ryan Bowen's Stipulated Motion to Dismiss without Prejudice.	0.30	\$350	\$105.00
3/26/2024	KMW	Email exchanges with defense counsel on stipulated dismissal of Ryan Bowen; review and approve stipulated motion. Consult with K. Pepin.	0.40	\$650	\$260.00
3/26/2024	TAB	Communications with counsel for defendants and SEC.	0.20	\$650	\$130.00
3/27/2024	KMW	Call and email exchanges with other defense counsel to discuss strategy and	1.00	\$650	\$650.00

issues with unfreezing bank accounts. Work on fee affidavit for payment of attorneys fees by SEC.

3/27/2024 TAB Communications with coordinating counsel. Review of correspondence from SEC regarding unfreezing accounts. Communication with clients. (.3) Call with friendly counsel and K. Woodwell discussing case status and strategy. (.2).

0.50 \$650 \$325.00

Total Fees: 03/2024

\$6,565.00

Statement of Account

325672 BW HOLDINGS, LLC

Apr-24

001000 SEC Litigation

Time & Rate: Original Value

Date	ID	Description	Hrly Rate	Bill Amount
4/6/2024	TAB	Consult with K. Woodwell. (.2).	\$650	\$130.00
4/9/2024	KMW	Meet SEC to discuss Order on Sanctions and likely path of any future SEC investigation.	\$650	\$350.00
4/10/2024	KEP	Meeting with K. Woodwell to discuss Affidavit of Fees.	\$350	\$105.00
4/10/2024	KMW	Consult with T. Brady and K. Pepin on fee affidavit.	\$650	\$260.00
4/10/2024	TAB	Consult with K. Woodwell discussing fee affidavit.	\$650	\$260.00
4/15/2024	KEP	Draft Affidavit of Attorneys Fees and Costs.	\$350	\$630.00
4/15/2024	KMW	Consult with K. Pepin on Affidavit of attorneys fees.	\$650	\$130.00
4/15/2024	TAB	Consult with K. Pepin regarding Affidavit of Attorneys Fees. (.2) Analyzed legal fees related to TRO. (1.7).	\$650	\$1,235.00
4/16/2024	KEP	Call with T. Brady to discuss State of Fees for Fee Affidavit.	\$350	\$70.00
4/16/2024	KMW	Review and revise fee affidavit and spreadsheet with fees for submission to judge. Consult with T. Brady and K. Pepin.	\$650	\$325.00
4/16/2024	TAB	Call with K. Pepin regarding Affidavit for Attorneys Fees. (.2) Consult with K. Woodwell. (.2) Review of time entries. (.2).	\$650	\$390.00
4/17/2024	KMW	Review motion from Receiver on Fee Affidavit. Review and file fee affidavit.	\$650	\$195.00
4/17/2024	TAB	Analyzed, modified, and finalized accounting entries for supporting documentation on fees for Affidavit. Consults with K. Pepin and B. Buchholz on the same. (1.9) Final review of Fee Affidavit. (.3) Coordination with K. Pepin on filing. (.2).	\$650	\$1,560.00

Total Fees: 04/2024

\$5,640.00

Statement of Account

325672 BW HOLDINGS, LLC

001000 SEC Litigation

Time & Rate: Original Value

Fees

Date	ID	Description	Time	Hrly Rate	Bill Amount
Total Fees: August 2023 - April 2024					\$169,070.00